



Law Offices of Bennet & Bennet, PLLC

Maryland

6124 MacArthur Boulevard
Bethesda, Maryland 20816
Tel: (202) 371-1500
Fax: (202) 371-1558
www.bennetlaw.com

District of Columbia

5185 MacArthur Boulevard, NW, Suite 729
Washington, DC 20016

Caressa D. Bennet

Michael R. Bennet

Marjorie G. Spivak*

Howard S. Shapiro

** Admitted in DC & PA Only*

Daryl A. Zakov[^]

Robert A. Silverman

Erin P. Fitzgerald

Frederick W. Giroux[#]

[^]Admitted in DC & WA Only

[#]Admitted in DC & MA Only

June 29, 2017

Via ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: CT Cube, L.P.
E911 Location Accuracy Certification
PS Docket No. 17-78**

Dear Ms. Dortch:

Transmitted herewith, on behalf of CT Cube, L.P. ("CT Cube") and pursuant to Section 20.18(i)(2)(iii)(C) of the Rules and Regulations of the Federal Communications Commission, is CT Cube's E911 Indoor Location Accuracy Certification. CT Cube requests leave to file this certification after the June 2 deadline and, to the extent necessary, a waiver of the filing deadline.

The delay in filing resulted from delays in connection with its E911 service vendor. CT Cube contacted its E911 service vendor in early February to request data on location accuracy, but due to delays in negotiating and executing the necessary contracts, CT Cube did not receive such data until June 2. Upon receipt of the data, CT Cube's engineers worked with its outside counsel to determine whether the data demonstrated full compliance with Section 20.18(i)(2)(i)(B)(1) of the Commission's rules. After requesting and receiving additional data from its service vendor, CT Cube was able to confirm its compliance and executed the attached certification.

Should the Commission have any questions, please communicate directly with the undersigned.

Sincerely,

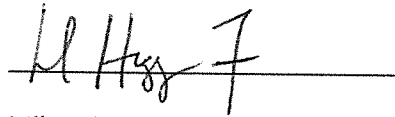
/s/ Michael R. Bennet

Michael R. Bennet

Attachment

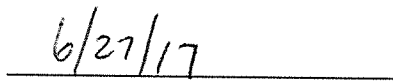
Certification of Compliance with E911 Location Accuracy Benchmark – PS Docket No. 17-78

I, Mike Higgins, Jr., am an Officer of CT Cube, L.P. ("Company") and I am familiar with and have responsibility for Company's indoor location accuracy compliance. I hereby certify that, as of April 3, 2017, the Company (1) does not provide service or report live call data in one or more of the Test Cities; (2) is providing dispatchable location or x/y location information within 50 meters for 40 percent of all wireless 911 calls; (3) has deployed the indoor location technology or technologies used in its networks consistently with the manner in which such technologies have been tested in the test bed; and (4) has verified based on its own live call data that it is in compliance with the two-year benchmark set forth at 47 C.F.R. §20.18(i)(2)(i)(B)(1).

A handwritten signature in black ink, appearing to read "Mike Higgins Jr", is written over a horizontal line.

Mike Higgins, Jr.

General Manager

A handwritten date "6/27/17" is written in black ink over a horizontal line.

Date